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November 16, 2022

The Honorable Helen Gillmor
United States District Court
District of Hawai'i
300 Ala Moana Blvd., C-338
Honolulu, HI 96850

Re: *Young v. Hawaii et al.*, Civil No. 12-cv-00336-HG

Dear Judge Gillmor:

As discussed in the parties' September 20, 2022 letter to this Honorable Court, the parties reached a tentative settlement agreement that would resolve all claims, subject to approval by the Hawai'i County Council. On November 2, 2022, the Hawai'i County Council approved the settlement.

After approval of the settlement by the Hawai'i County Council, counsel for Plaintiff and the counsel for the County of Hawai'i engaged in discussions regarding a *Release and Indemnification Agreement* ("Release"). Late yesterday afternoon, the parties reached an agreement on the language for the Release.

After the signed Release is received by the County, it is anticipated that a stipulation to dismiss will be submitted to this Honorable Court within 45 days.

Yours Truly,

/s/ Steven K. Idemoto
STEVEN K. IDEMOTO
Attorney for the County Defendants

/s/ Alan A. Beck
ALAN A. BECK
Attorney for Plaintiff

/s/ Nicholas M. McLean
NICHOLAS M. MCLEAN
Attorney for the State Defendants

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